

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

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<b>TERRI PECHNER-JAMES and</b>	:
<b>SONIA FERNANDEZ,</b>	:
 <b>Plaintiffs,</b>	:
 v.	:
	<b>C.A. No.: 03-12499MLW</b>
 <b>CITY OF REVERE, THOMAS AMBROSINO,</b>	:
<b>Mayor, CITY OF REVERE POLICE</b>	:
<b>DEPARTMENT, TERRENCE REARDON,</b>	:
<b>Chief, BERNARD FOSTER, SALVATORE</b>	:
<b>SANTORO, ROY COLANNINO, FREDERICK</b>	:
<b>ROLAND, THOMAS DOHERTY, JOHN</b>	:
<b>NELSON, JAMES RUSSO, MICHAEL</b>	:
<b>MURPHY and STEVEN FORD,</b>	:
 <b>Defendants.</b>	:
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**AFFIDAVIT OF JOHN K. VIGLIOTTI**

Now comes the undersigned affiant and does depose as follows:

1. My name is John K. Vigliotti, I am of majority age and otherwise qualified and capable of making a statement under oath.
2. I am an attorney, duly licensed to practice law in the Commonwealth of Massachusetts. I am counsel for Defendants, Bernard Foster, Salvatore Santoro, Roy Colannino, Frederick Roland, Thomas Doherty, John Nelson, James Russo, Michael Murphy and Steven Ford in connection with the above captioned matter now pending before the United States District Court.
3. My current billable rate on this case is one hundred dollars (\$100.00) dollars an hour.
4. In connection with this litigation and as part of the discovery process I have attempted in good faith to resolve the present discovery dispute.
5. Attached as Exhibits A through O to said Motion to Compel Production of

Documents are true and accurate copies of said documents.

6. Plaintiffs has failed to cooperate in the process which has resulted in me engaging in unnecessary work to prepare Defendants' Motion to Compel Production of Documents.
7. I have expended in excess of ten (10) hours in my efforts to produce an informal remedy and preparing Defendant's Motion to Compel Production of Documents and for Fees and Cost, resulting in expenses and fees well over the one thousand (\$1,000.00) dollars requested in Defendants' motion.

Signed under the penalties of perjury on this 12<sup>th</sup> day of September, 2005.

  
John K. Vighotti